

EXHIBIT 2

FILED UNDER SEAL

In the Matter Of:

FAIR ISAAC CORPORATION

vs

FEDERAL INSURANCE COMPANY, et al.

RAMESH PANDEY

November 13, 2018

epiq
court reporting solutions

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1 we'll move on from there.	1 Q. Yes.	
2 MR. FLEMING: He did say that, but...	2 (There is a discussion off the	
3 A. I don't recall it. I don't remember	3 record.)	
4 it.	4 A. Column "N" for Nancy.	
5 MR. FLEMING: That's what he said.	5 Q. And then you see "Raleigh" is	
6 Q. I did not hear that answer so...	6 identified a couple of times.	
7 A. I was just telling that the guy	7 That's Raleigh, North Carolina?	
8 started, you know, this was created in May. It was	8 A. Yes, data center.	
9 too early for me, probably.	9 Q. And then it identifies Toronto as a	
10 Q. Good.	10 data center?	
11 A. I was learning more Chubb at that	11 A. Yes.	
12 time.	12 Q. Is Toronto still a data center for	
13 Q. Okay.	13 Blaze Advisor?	
14 (Deposition Exhibit 160, e-mail	14 A. I don't think so. With Toronto --	
15 string FED003522_0001 to FED003522_0004	15 what happened, actually, we are consolidating the	
16 marked Confidential and attachment, was	16 data centers. We had 48 data centers before.	
17 marked for identification.)	17 Raleigh was one of them. Canada was another one.	
18 Q. This document, Exhibit 160, you see	18 Q. Before when, if I can interrupt?	
19 in the first page from its date, July 7, 2014, is, I	19 A. Before merger.	
20 guess, similarly at the beginning of your time with	20 Q. Okay.	
21 the company.	21 A. And after that, we made that we need	
22 You're not shown as being on the	22 only eight data centers. And Canada was not one of	
23 e-mail.	23 those eight. So we are migrating everything to	
24 A. Yeah, I'm not.	24 Raleigh.	
25 Q. Okay. Can you identify the nature of	25 Q. How many data centers today are there	
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1 the attachment entitled, "CAZ ChEAR report"? Do you	1 in the United States?	
2 know what that means?	2 A. Oh, you have to have only two,	
3 A. "ChEAR," Chubb Enterprise	3 primary and secondary.	
4 Architecture report.	4 Q. And they are located where?	
5 Q. And --	5 A. Raleigh and Salisbury, Connecticut.	
6 A. "CAZ," Canada zone probably. I'm	6 Q. And outside of the United States	
7 guessing. But I never heard about this word "CAZ."	7 today, where are the data centers located?	
8 Q. Before the lunch, you weren't	8 A. So, for Latin America, it's either	
9 remembering what "CAZ" meant.	9 somewhere in Texas, Dallas, I think. For Europe,	
10 A. Yeah, that's what I'm saying. I know	10 it's in Crowley (phonetic), London. Singapore, I	
11 I heard of this, "CAZ."	11 think, but that's not my -- I'm not...	
12 But really what we use to the naming	12 Q. You said there were eight data	
13 Canada we used "Z" for "Zone," right. And "CA" --	13 centers today?	
14 but Canada is a country, not a Zone. So it doesn't	14 A. I'm just -- two of them I know.	
15 make sense.	15 Other one I know because it's in Dallas, but it	
16 Q. Alright. And as I read this document	16 supports the Latin America, all the...	
17 under column "N" --	17 And Crowley (phonetic) I know because	
18 MR. FLEMING: Talking about the	18 that's sort of -- but I think it's one in Singapore.	
19 attachment?	19 Other one I don't know where they are.	
20 MR. HINDERAKER: I am. Thank you.	20 Q. Okay. Do you know if there's one in	
21 Q. With the document being 1 of 2, you	21 Australia, a data center?	
22 know, the attachment on the page being 1 of 2?	22 A. No, I don't think so. I don't know.	
23 A. Yeah.	23 Q. You don't one way or the other?	
24 Q. It identifies data center location.	24 A. I don't know.	
25 A. Yeah, in column "N."	25 Q. Are all of the applications --	

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1	speaking today, are all of the applications that	1	center, service center, those guys. Sometimes it
2	support insurance policies sold in Canada hosted	2	comes with the project management team. This is
3	from the data center in Raleigh?	3	what we want to do, this is what we think we should
4	A. Raleigh.	4	do. Let's see how much in the bank, how many people
5	Q. Do you know when the migration from	5	we need, how long it will take.
6	the Toronto data center to everything being on the	6	Q. Did you say project management team
7	Raleigh data center was completed?	7	or product management team?
8	A. Completed no, I don't. Exact date, I	8	A. Product managers have the project
9	don't know. It's somewhere -- it was unleashed 2018	9	manager inside. It's like every product they cannot
10	or late 2017. But I don't know the exact month.	10	speak IT terms. So they need somebody who is like
11	(Deposition Exhibit 161, Architecture	11	project manager for products.
12	Introduction - Fiduciary PI Model	12	Q. Alright. So slowing it down a little
13	FED006068_0001 to FED006068_0006 marked	13	bit, we talked earlier this morning about what a
14	Confidential, was marked for	14	"product" is.
15	identification.)	15	A. Yes.
16	Q. This Exhibit 161 is dated January 22,	16	Q. A form of "coverage?"
17	2015. It has a title, "Architecture Introduction -	17	A. Yeah.
18	Fiduciary PI Model," and it is prepared by Joanne	18	Q. So somebody that is responsible for
19	Kelly.	19	the product would like to have IT support for the
20	Who is Joanne Kelly, if you know?	20	product, that person works with a project manager?
21	A. She used to be the architect on the	21	A. Yeah.
22	compliance team.	22	Q. Who then interfaces with IT --
23	Q. Do you know -- what is your	23	A. Yeah, yeah.
24	understanding of the meaning of a "fiduciary PI	24	Q. -- to describe the desired scope?
25	model?"	25	A. Yeah.
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1	A. "PI" the "profitability indicator	1	Q. Okay. So the original source of the
2	model? "I don't know why she put the "fiduciary."	2	desire for the technology application comes from
3	I don't really know what that is.	3	persons responsible for the products, the forms of
4	Q. Okay, fair enough. Fair enough.	4	coverage?
5	That's all I'm asking.	5	A. Products or operations.
6	Are you familiar with this form of	6	Q. Or operations?
7	document?	7	A. Yeah. Operations guy, they need it
8	A. Okay. So there are similar documents	8	because they have to run the report. If somebody
9	and I'm guessing that that's all it probably is.	9	asks you like how your office run, how much you
10	MR. FLEMING: He's not asking you to	10	bring the money, how much you spend the money.
11	guess.	11	Q. Okay.
12	THE WITNESS: Okay.	12	A. Somebody there who creates all the
13	A. This appears like part of the	13	reports, that's not product guys, it's operations
14	document which we used to use to capture the scope	14	guys.
15	saying that in the future we are -- we want to do	15	Q. So we've identified "operations"
16	the project and that's how the project will look	16	people?
17	like, scoping terms stuff.	17	A. Yes.
18	Q. Okay. Who gives you the "scoping"	18	Q. And we've identified "product"
19	information?	19	people?
20	Let me rephrase that question to be	20	A. Yeah. Product guys are the guy that
21	more precise.	21	build the product and they sell. Operations guys is
22	Who gives IT the "scoping"	22	the one who keeps all the documentation.
23	information?	23	Q. I understand the difference.
24	A. It comes from the front people.	24	And how about the underwriters, do
25	Sometimes it comes with the operations team, call	25	you put them in the "product" category?